



Environment Canada Environnement
Canada Canada

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Our file: 4703 001 004

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Via Email

**Re: NWB1ULU0008/TR/D9 – Wolfden Resources Inc. –
 Submission of Geotechnical Inspection Report – Ulu Mine Site**

On behalf of Environment Canada (EC), I have reviewed the Geotechnical Inspection Report dated September 9, 2005, and offer the following comments for your consideration.

An annual geotechnical inspection was performed at the Ulu Project this past August in compliance with the proponent's licence requirement (Part D, Item 9). The purpose of an annual geotechnical inspection report is to assess the performance of water and waste retaining structures from geotechnical and hydro-technical perspectives. Jim Cassie of BGC Engineering Inc. conducted the inspection on 24-25 August 2005. The facilities and structures identified within the annual inspection program are as follows:

- Ulu main tank farm containment berm
- day tank containment berm
- camp 3 tank farm containment berm
- mine sump
- ore storage pad
- portal laydown pad

Environment Canada requests that the proponent submit a detailed implementation plan of how it has responded to the recommendations provided in the 2005 geotechnical report. A cover letter addressed to Phillippe de Pizzo on September 13, 2005 indicated that all of the geotechnical report's recommendations were complied with but this form of notification does not fulfill Part D, Item 9 of the water license: *"The licensee shall submit a cover letter outlining an **implementation plan to respond to the engineer's recommendations.**"*



Environment Canada requests the following information of the proponent:

TANK FARM MAINTENANCE

- Confirm that the restoration of the fuel tank berm sand covers has been done, and that containment capacity was not affected by liner damage
- Regarding the puddle of fuel identified between the two skid mounted fuel tanks in the Camp 3 tank farm, the proponent should have identified the cause of the spill (whether tank leakage or transfer problems), and describe how it was cleaned-up as well as measures taken to prevent future spills.
- BGC Engineering Inc. noted that the day tank farm's containment berm geomembrane liner was exposed. No recommendations were made to restore the berm's sand cover in the geotechnical report. Environment Canada requests that the berm be completely covered with sand so as to prevent any tearing of the liner.
- The proponent was requested to evaluate the secondary containment capacity of the existing berms against that of the maximum fuel volumes of the storage tanks. Please advise the Nunavut Water Board regarding whether the results of these calculations confirm that sufficient containment capacity exists.

MINE SUMP

- The proponent was advised to remove rock fill observed within the mine sump, to examine the liner for tears, repair any observed tears, and to ensure that the liner is covered with sand. Environment Canada requests that the proponent confirm completion of this work. EC acknowledges that the decline is currently inactive and that there may not be a sense of urgency to complete this task. If the mine sump has not undergone remediation as of yet, EC recommends that it not be used until the work is done.

PORTAL LAYDOWN (WASTE ROCK) PAD

- The proponent was asked to determine whether or not there is a need to have a silt curtain in this location and to repair its curtain if convinced that it would collect sediment from run-off. EC requests that the proponent confirm what course of action it has taken with respect to this silt curtain.
- Environment Canada supports BGC Engineering Ltd.'s recommendation for monitoring the quantity and quality of seepage from the laydown pad.

ORE STORAGE PAD

- A small flowing discharge which carries sediment was noted at the ore storage pad's toe. Environment Canada supports the recommendation for monitoring the quantity and quality of seepage from the laydown pad as requested by BGC Engineering Ltd.



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Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing at (867) 975-4631 or by email via david.abernethy@ec.gc.ca.

Regards,

David W. Abernethy
Environmental Assessment Technician

cc: Colette Spagnuolo (Environmental Assessment & Contaminated Sites Specialist, Iqaluit)